

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

NOV 15 2018

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL HALFORD,

Defendant.

No.

4:18CR00953 RLW/NCC

INDICTMENT

COUNT 1

The Grand Jury charges that:

INTRODUCTION

At all times relevant to this Indictment:

1. Peoples Bank & Trust, Midland States Bank, and Wells Fargo are organizations established for the purpose of providing banking services. They conduct business in, and affecting, interstate commerce.

2. The term "counterfeit" means a document that purports to be genuine but is not, because it has been falsely made or manufactured in its entirety.

3. The term "security" means a check, traveler's check, money order, or debit instrument.

4. The term "utter" means to put as currency into circulation, or to circulate a counterfeit security as if legal or genuine.

THE CHARGE

Beginning at least by August 17, 2018 and continuing until October 23, 2018, in the Eastern District of Missouri,

DANIEL HALFORD,

the defendant herein, along with others known and unknown to this Grand Jury, did knowingly and willfully agree and conspire together to make, utter and possess counterfeit securities of Peoples Bank & Trust, Midland States Bank, and Wells Fargo, with intent to deceive another person or organization.

MANNER AND MEANS

The means and methods by which the conspiring was sought to be accomplished included, among others, the following:

- a. Defendant obtained computer hardware and software in order to create counterfeit securities,
- b. Defendant created counterfeit securities,
- c. Defendant recruited individuals to utter those counterfeit securities,
- d. Defendant provided counterfeit securities to those individuals who attempted to utter and pass them at commercial stores,
- e. Defendant himself attempted to utter counterfeit securities which he created.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, the defendant committed and caused the following over acts:

The Grand Jury hereby realleges and incorporates, by reference, all of the allegations set forth in Counts 2, 3 and 4 of this Indictment, as if fully set forth herein.

All in violation of, and punishable under, Title 18, United States Code, Section 371.

COUNT 2

The Grand Jury further charges that:

On or about August 17, 2018, in the Eastern District of Missouri,

DANIEL HALFORD,

the defendant herein, did possess a counterfeited security of Midland States Bank, that being a check with number 57011, payable to D.P., in the amount of \$926.76, purporting to be issued by O'Brien's Restoration, but actually drawing from an account that does not exist, with the intent to deceive another person or organization.

In violation of, and punishable under, Title 18, United States Code, Section 513(a).

COUNT 3

The Grand Jury further charges that:

On or about September 6, 2018, in the Eastern District of Missouri,

DANIEL HALFORD,

the defendant herein, did possess a counterfeited security of Peoples Bank & Trust, that being a check with number 4219 payable to T.S., in the amount of \$852.88, purporting to be issued by Smart Construction but actually drawing from an account assigned to Lincoln County Sheriff's Department, with the intent to deceive another person or organization, namely Crown Food Mart.

In violation of, and punishable under, Title 18, United States Code, Section 513(a).

COUNT 4

The Grand Jury further charges that:

On or about October 23, 2018, in the Eastern District of Missouri,

DANIEL HALFORD,

the defendant herein, did possess a counterfeit security of Wells Fargo, that being a check with number 180024, payable to Daniel Halford in the amount of \$795.09, purporting to be issued by Fedex Corp. Shipping Center, but actually drawing from an account that does not exist, with the intent to deceive another person or organization.

In violation of, and punishable under, Title 18, United States Code, Section 513(a).

COUNT 5

The Grand Jury further charges that:

On or about October 23, 2018, in the Eastern District of Missouri,

DANIEL HALFORD,

the defendant herein, having been previously convicted in the Circuit Court of St. Charles County, Missouri, on December 18, 2012, in cause number 1211CR3597 of the felony offenses of Theft Over \$500 and Burglary Second Degree, and on June 5, 2013 in cause number 1311CR166001 of the felony offense of Distribution of a Controlled Substance, crimes punishable by a term of imprisonment exceeding one year under the laws of the State of Missouri, did knowingly and intentionally possess a firearm which previously traveled in interstate commerce during or prior to being in defendant's possession, to wit: an IO-Inc. make, 10-15 model, multicaliber pistol, bearing serial number 1015-03723.

In violation of Title 18, United States Code, Section 922(g)(1) and punishable under Title 18, United States Code, Section 924(a)(2).

COUNT 6

The Grand Jury further charges that:

On or about October 23, 2018, in the Eastern District of Missouri,

DANIEL HALFORD,

the defendant herein, did unlawfully possess a letter addressed to B.A. at xxx Holly Terrace Court, Ballwin, Missouri which had been stolen, taken, and abstracted from a letterbox, post office, mail receptacle or mail route, which was an authorized depository for mail matter, knowing the said letter to have been stolen, taken, and abstracted from an authorized depository for mail matter.

In violation of, and punishable under, Title 18, United States Code, Section 1708.

A TRUE BILL.

FOREPERSON

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